

May 14, 2021

The Honorable Jocelyn G. Boyd  
Chief Clerk/Executive Director  
Public Service Commission of South Carolina  
101 Executive Center Drive, Suite 100  
Columbia, SC 29210

**Via SCPSC E-FILING DMS**

**Re: South Carolina Office of Regulatory Staff's Motion to Solicit Comments from Utilities and Other Interested Stakeholders Regarding Measures to Be Taken to Mitigate Impact of Threats to Safe and Reliable Utility Service;  
Docket No. 2021-66-A**

Dear Ms. Boyd:

Please find attached for electronic filing with the South Carolina Public Service Commission ("Commission") a copy of the Petition to Intervene of Walmart Inc. ("Walmart"), in the above-referenced case. By copy of this letter, I am serving all parties of record via Electronic Mail.

Please contact us if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By



Stephanie U. Eaton (SC Bar No. 80073)  
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*Counsel to Walmart Inc.*

SUE/sds  
Attachments  
c: Certificate of Service

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2021-66-A

IN RE:	)	<b>CERTIFICATE OF SERVICE</b>
	)	
South Carolina Office of Regulatory Staff's	)	
Motion to Solicit Comments from Utilities and	)	
Other Interested Stakeholders Regarding	)	
Measures to Be Taken to Mitigate Impact of	)	
Threats to Safe and Reliable Utility Service	)	

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I hereby certify that I have this day served one (1) copy of the foregoing document upon the following parties to this proceeding via Electronic Mail:

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Docket No. 2017-305-E  
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Stephanie U. Eaton (SC Bar No. 80073)

Dated: May 14, 2021

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2021-66-A

IN RE:	)	
	)	
South Carolina Office of Regulatory Staff's	)	<b>PETITION TO INTERVENE OF</b>
Motion to Solicit Comments from Utilities	)	<b>WALMART INC.</b>
and Other Interested Stakeholders Regarding	)	
Measures to Be Taken to Mitigate Impact of	)	
Threats to Safe and Reliable Utility Service	)	

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Pursuant to Rule 103-825 of the rules and regulations of the South Carolina Public Service Commission ("Commission"), Walmart Inc. ("Walmart"), by its attorneys, respectfully requests that the Commission permit it to intervene as an interested party in the above-captioned matter. In support of its Petition to Intervene, Walmart submits as follows:

1. On February 22, 2021, the South Carolina Office of Regulatory Staff ("ORS") filed a *Motion to Solicit Comments from Utilities and Other Interested Stakeholders Regarding Measures to be Taken to Mitigate Impacts of Threats to Safe and Reliability Utility Service*, requesting that the Commission to open a docket and require regulated electric and natural gas utilities and allow the South Carolina Public Service Authority ("Santee Cooper"), the electric cooperatives, and other non-regulated utilities, to provide information to the Commission regarding measures the utilities have taken and plan to take to mitigate the negative impacts of potential ice storms and other dangerous weather conditions and to ensure peak customer demands on the utility system can be met during extreme weather events.

2. On March 10, 2021, the Commission issued Order No. 2021-163, *Order Establishing Docket and Guidelines for Comments by Utilities and Other Interested Stakeholders Regarding Mitigation of Impact of Threats to Safe and Reliable Utility Service*. The Order

establishes specific information and assessments that electric and natural gas utilities must provide to the Commission, and it sets dates for the filing of Initial Comments and Responsive Comments by "Interested Parties." The Commission specifically defined "Interested Parties" as "all regulated jurisdictional utilities of the Public Service Commission of South Carolina (Commission) and any entities not regulated by the Commission that are participating in this proceeding and docket."

3. Walmart is a global retailer of goods and services and also operates throughout the United States. Walmart's principal energy management office is located at 2608 SE J Street, Bentonville, AR 72716.

4. Walmart has the privilege of providing its retail services in the State of South Carolina. Walmart is a large commercial customer of Dominion Energy South Carolina, Inc. ("DESC"), Duke Energy Carolinas, LLC ("DEC"), and Duke Energy Progress, LLC ("DEP") (collectively, "Electric Utilities"). Walmart has approximately 97 facilities in South Carolina that are served by the Electric Utilities, which include Walmart Supercenters, Sam's Clubs, gas stations, Neighborhood Markets, and one distribution center.

5. The steps the Electric Utilities take to ensure they are able to meet customer demands during periods of extreme weather events has a direct impact on Walmart's operations and the customers it serves. Indeed, during extreme weather events, customers depend on being able to obtain basic necessities from Walmart. As such, Walmart has a direct and substantial interest in the outcome of this proceeding.

6. The attorneys representing Walmart in this proceeding are:

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Ms. Eaton is authorized to accept service of papers in this proceeding on behalf of Walmart. Walmart also respectfully requests that Ms. Grundmann and Mr. Williamson be added to the service list. Walmart may file a motion for Ms. Grundmann and/or Mr. Williamson to be admitted *pro hac vice* before this Commission, and subsequent to any Commission grant of such request, Walmart requests that Ms. Grundmann and Mr. Williamson be added to the official service list as attorneys authorized to accept service of papers in this proceeding.

**WHEREFORE**, Walmart respectfully requests that it be granted leave to intervene and be made a party to the above-captioned proceeding.

Respectfully submitted,

SPILMAN THOMAS & BATTLE, PLLC

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Dated: May 14, 2021